



City of Camarillo

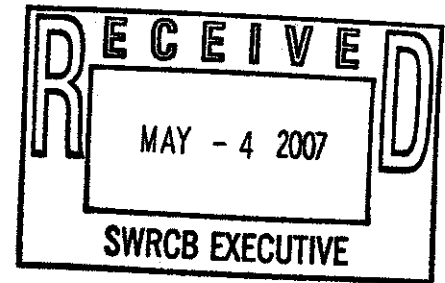
601 Carmen Drive • P.O. Box 248 • Camarillo, CA 93011-0248

Construction General
Permit – Stormwater
Deadline: 5/4/07 5pm

Department of Public Works
805-388-5338; 383-5659

May 4, 2007

Ms. Song Her, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: **Comment Letter – Draft General Construction NPDES Permit dated 3/2/07
(Order No. 99-08-DWQ)**

Dear Ms. Her:

Thank you for the opportunity to contribute comments regarding the above referenced draft General Construction Permit. The City of Camarillo concurs with the Ventura Countywide Storm Water Program comment letter dated May 4, 2007, which we hereby incorporate our support for the record. As outlined in the countywide response letter, some of the major concerns are as bulleted:

- Setting Numerical Effluent Limits (NELs) for construction storm water runoff is premature for Ventura County at this time. The NPDES storm water program needs to remain consistent with its traditional triad approach in mitigating the impacts of storm water runoff associated with construction sites before the establishment of NELs.
- The requirement for active treatment systems (ATS) should be postponed until a better understanding of ATs water quality data is explored, benchmarks determined and guidelines developed.
- The draft Fact Sheet conflicts with Attachment C of the Draft Permit regarding projects subject to the Permit. We recommend the draft Fact Sheet be rewritten to include the following language from the current Order No. 99-08-DWQ, "Construction activity does not include routine maintenance to maintain original line and grade, hydraulic capacity, or original purpose of the facility, nor does it include emergency construction activities required to protect public health and safety."
- For those construction sites that fall within the jurisdiction of an existing Municipal Stormwater NPDES Permit, hydromodification should be regulated by those permits and not in the General Construction Permit as a one-size fits all solution due to the differences in hydrology and soils throughout California.

The City of Camarillo appreciates this opportunity to submit comments to the Draft General Construction Permit and we want to reiterate our commitment to the collaborative effort in maintaining and enhancing water quality in our watershed. We look forward to the State Water Board's response to our comments and the comments in the Ventura Countywide Stormwater Program letter. If you have any questions regarding our comments, please contact Anita Kuhlman, Stormwater Coordinator, at 805-383-5659.

Sincerely,

Lucie McGovern /ax

Lucie McGovern
Deputy Public Works Director